



April 2, 2007

Kris A. Monteith
Chief, Enforcement Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: WT Docket No. 05-287

Dear Ms. Monteith:

Alltel Corporation ("Alltel") submits this third monthly E-911 compliance report pursuant to the requirements set forth in paragraphs 25 and 30 of the Commission's Order of January 5, 2007.¹

I. Percentage of Alltel Customers with Location-Capable Handsets.

Alltel reports that, as of February 28, 2007, 94.2 % of its subscribers in those markets utilizing the AGPS handset based solution for establishing E-911 Phase II compliance had AGPS equipped E-911 Phase II capable handsets. This figure represents an improvement of 0.8 percentage points over the previously reported figure for January 31, 2007.

II. Alltel's Efforts to Encourage Upgrades to Location-Capable Handsets.

Ongoing Customer Contact. Alltel continues its use of billing system alerts that identify accounts that are associated with non-compliant, non-AGPS phones, and alerts Alltel service personnel so that the customer may be advised that the phone(s) on their account are not location-capable. Alltel also continues to provide its sales and service representatives with a "look up" tool that lists all known non-compliant phones to ensure that only AGPS equipped phones are activated by subscribers to Alltel's network. These tools are used by both consumer and business account representatives.

¹ See, *In the Matter of Alltel Corporation Petition for Limited Waiver of Location-Capable Handset Penetration Rule*, WT Docket No. 05-287, FCC 06-64 (released January 5, 2007) (the "Order"). Pursuant to paragraph 25 of the Order, Alltel is required to file monthly reports beginning on February 1, 2007 setting forth its most current AGPS handset deployment percentage as well as the specific steps it is taking to augment AGPS handset deployment. The instant filing is the second such report.

Direct Marketing and Communications. On a monthly basis, Alltel continues to send E911-themed mailings to subscribers who have non-AGPS compliant phones. These letters are followed up with SMS messages to those customers with text-capable handsets. Customers are also now being targeted with a telemarketing campaign. Alltel also continues with its program to augment the replacement of "bag-phones" with the new Motorola M800 digital bag phone, a high powered device which is also AGPS equipped. All analog customers are being directly contacted to convert to an AGPS compliant phone through a targeted telemarketing campaign.

E-911 Education Communications. Alltel will continue to utilize bill inserts, bill messages, in-store displays and collateral materials, as well as web site postings to highlight the benefits of E-911 service and urge customers to ensure that they have an AGPS equipped handset in order to take advantage of the E-911 ALI function where available.

Offers and Incentives. Alltel has provided steep discounts to subscribers willing to upgrade to AGPS capable handsets and now offers new AGPS-equipped phones for as little as \$.01 with a two-year service commitment. Alltel continues to permit upgrades to new phones without upgrade fees, and is also making available refurbished AGPS capable handsets for nominal cost without a service commitment at select retail outlets. New efforts that have been initiated include a specific campaign directed to analog subscribers that offers the M800 (Motorola Digital Bag phone) for \$.99 with no contract requirement. Additionally, Alltel is providing a discount of \$50 off the retail price of any phone, without the subscriber having to enter a contract. Subscribers taking advantage of either of these two new incentive plans also receive 100 free "anytime" minutes for a period of three months from the date of upgrade. Alltel has extend the offer of three months of 100 free "anytime" minutes to additional subscribers with non-compliant handsets, and, as noted about is conducting targeted automated telemarketing campaigns to subscribers with non-compliant handsets.

Alltel will report next to the Commission on May 1, 2007. Should there be any question or concern regarding this report, please contact undersigned counsel.

Respectfully submitted,

Alltel Corporation

By: 

Glenn S. Rabin

Vice President

Federal Communications Counsel